

1 The Honorable Tana Lin  
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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

10 MICROSOFT CORPORATION, a  
11 Washington corporation,

12 Plaintiff,

13 v

14 THE SEARCH PEOPLE ENTERPRISES  
15 LTD., a British Columbia, Canada,  
16 corporation; MEHTABJIT SINGH TEJA, aka  
RONNIE TEJA, an individual; and DOES 1–  
10,

17 Defendants.

Case No. 2:22-cv-01113-TL

**STIPULATED MOTION  
REGARDING THE DEPOSITION OF  
MICROSOFT CORPORATION AND  
PROPOSED ORDER**

**NOTE ON MOTION CALENDAR:  
January 24, 2025**

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28 Case No. 2:22-cv-01113-TL

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1 Defendants The Search People Enterprises Ltd. (“TSPE”) and Mehtabjit Singh Teja, aka  
 2 Ronnie Teja (“Teja”) (collectively, “Defendants”) and Plaintiff Microsoft Corporation  
 3 (“Plaintiff”) (Defendants and Plaintiff collectively, “The Parties”) stipulate as follows:

4 **I. RECITALS**

5 1. Pursuant to the Order Resetting Bench Trial Date and Related Dates (Dkt. No. 43),  
 6 fact discovery in this matter is to be completed by February 3, 2025.

7 2. On January 8, 2025, Defendants served Plaintiff with an amended notice to take  
 8 the deposition of Plaintiff on January 30, 2025 (the “Depo Notice”).

9 3. On January 16, 2025, Plaintiff filed a Motion for Protective Order Under Rule  
 10 26(c)(1) (“MPO”) (Dkt. No. 74) seeking a protective order.

11 4. The MPO is a 14-Day Motion under LCR 7(d), and thus will not be fully briefed  
 12 until January 30, 2025, the same date the deposition is scheduled to take place.

13 5. On January 21, 2025, the Court issued its Order on Discovery Motions (Dkt No.  
 14 77) (the “Discovery Order”). The Discovery Order requires Microsoft to provide additional  
 15 information as to Defendants’ Interrogatories Nos. 2 and 3 and Request for Production No. 8.

16 6. Defendants want to be able to review the forthcoming documents and amended  
 17 interrogatory responses prior to deposing Microsoft and intend to depose Microsoft on topics  
 18 related to those forthcoming documents and amended interrogatory responses.

19 7. The Parties further wish to postpone the deposition of Plaintiff until they receive  
 20 the Court’s ruling on Plaintiff’s MPO.

21 **II. STIPULATION**

22 8. Given the pending MPO and forthcoming documents and amended interrogatory  
 23 responses, the Parties stipulate to allow Defendants to depose Plaintiff after the February 3, 2025  
 24 discovery cutoff but before the end of February 2025. The Parties will meet and confer and set a  
 25 new date for the deposition to occur before the end of February 2025.

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### III. GOOD CAUSE STATEMENT

9. A party may obtain relief from the discovery cutoff date by demonstrating good cause for allowing further discovery. Fed. R. Civ. P. 16(b)(4).

10. The Parties demonstrate good cause for allowing this deposition to occur after the discovery cutoff. The MPO should be resolved prior to the deposition occurring and after Microsoft provides the documents and amended interrogatory responses required by the Discovery Order. Postponing the deposition until after the Court enters its order on Plaintiff's MPO will promote efficiency and provide clarity on the topics for which Microsoft's witness must be prepared to testify. Therefore, the Parties respectfully request that the Court grant this stipulation between the Parties, which is limited to Microsoft's deposition.

DATED: January 24, 2025

HANSEN LAW FIRM, P.C.  
Attorney for Defendants, The Search People  
Enterprises Ltd. and Mehtabjit Singh Teja, aka  
Ronnie Teja

By /s/ Craig A. Hansen  
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DATED: January 24, 2025

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## ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED: January 27, 2025

Tana Lin  
Tana Lin  
United States District Judge

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